

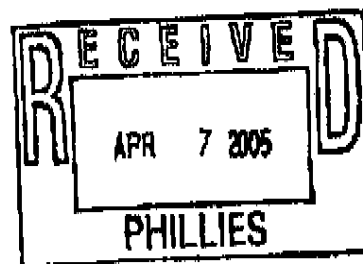
# EXHIBIT A

04/21/2005 11:29 FAX 260 673 1201

American Speciality

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File #4906-1  
BDC/mr  
PETRO COHEN PETRO MATARAZZO  
A Professional Corporation  
The Executive Plaza  
2111 New Road  
Suite 202  
Northfield, NJ 08225  
(609) 677-1700  
Attorneys for Plaintiff, Jason Williams



JASON WILLIAMS,

Plaintiffs,

v.

PHILADELPHIA PHILLIES,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
ATLANTIC COUNTY

DOCKET NO. ATL-L-002187-05

Civil Action

**SUMMONS**

The State of New Jersey, to the above named defendant(s):

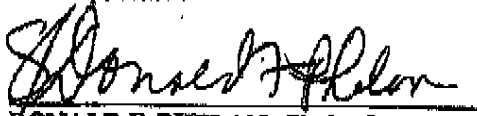
Philadelphia Phillies

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, NJ 08625. A \$135.00 filing fee payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed.

You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of numbers is also provided.

  
DONALD F. PHELAN, Clerk of  
the Superior Court

DATED: April 5, 2005

Name of defendant to be served: Philadelphia Phillies

Address of defendant to be served: Citizen's Bank Park  
Philadelphia, PA 19148

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**ATLANTIC COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division, Direct Filing  
1201 Bacharach Boulevard, First Fl.  
Atlantic City, NJ 08401  
**LAWYER REFERRAL**  
(609) 345-3444  
**LEGAL SERVICES**  
(609) 348-4200

**BERGEN COUNTY:**

Deputy Clerk of the Superior Court  
Case Processing Section, Room 119  
Justice Center, 10 Main St.  
Hackensack, NJ 07601-0769  
**LAWYER REFERRAL**  
(201) 488-0044  
**LEGAL SERVICES**  
(201) 487-2166

**BURLINGTON COUNTY:**

Deputy Clerk of the Superior Court  
Central Processing Office  
Attn: Judicial Intake  
First F. Courts Facility  
49 Rancocas Road  
Mt. Holly, NJ 08060  
**LAWYER REFERRAL**  
(609) 261-4862  
**LEGAL SERVICES**  
(609) 261-1088

**CAMDEN COUNTY:**

Deputy Clerk of the Superior Court  
Civil Processing Office  
1st Fl. Hall of Records  
101 S. Fifth Street  
Camden, NJ 08103  
**LAWYER REFERRAL**  
(609) 964-4520  
**LEGAL SERVICES**  
(609) 964-2010

**CAPE MAY COUNTY:**

Deputy Clerk of the Superior Court  
Central Processing Office  
9 N. Main Street  
Box DN-209  
Cape May Court House, NJ 08210  
**LAWYER REFERRAL**  
(609) 463-0313  
**LEGAL SERVICES**  
(609) 465-3001

**CUMBERLAND COUNTY:**

Deputy Clerk of the Superior Court  
Civil Case Management Office  
Broad & Fayette Sts., P.O. Box 615  
Bridgeton, NJ 08302  
**LAWYER REFERRAL**  
(609) 692-6207  
**LEGAL SERVICES**  
(609) 451-0003

**ESSEX COUNTY**

Deputy Clerk of the Superior Court  
237 Hall of Records  
465 Dr. Martin Luther King, Jr. Blvd.  
Newark, NJ 07102  
**LAWYER REFERRAL**  
(201) 622-6207  
**LEGAL SERVICES**  
(201) 624-4500

**GLOUCESTER COUNTY**

Deputy Clerk of the Superior Court  
Civil Case Management Office  
Attn: Intake  
First Fl., Court House  
1 North Broad Street, PO Box 129  
Woodbury, NJ 08096  
**LAWYER REFERRAL**  
(609) 848-4589  
**LEGAL SERVICES**  
(609) 848-5360

**HUDSON COUNTY**

Deputy Clerk of the Superior Court  
Superior Court, Civil Records Dept.  
Brennan Court House - 1st Floor  
583 Newark Avenue  
Jersey City, NJ 07306  
**LAWYER REFERRAL**  
(201) 798-2727  
**LEGAL SERVICES**  
(201) 792-6363

**HUNTERDON COUNTY**

Deputy Clerk of the Superior Court  
Civil Division  
65 Park Avenue  
Flemington, NJ 08862  
**LAWYER REFERRAL**  
(609) 735-2611  
**LEGAL SERVICES**  
(609) 782-7979

**MERCER COUNTY**

Deputy Clerk of the Superior Court  
Local Filing Office, Courthouse  
175 South Broad St., PO Box 8068  
Trenton, NJ 08650  
**LAWYER REFERRAL**  
(609) 585-6200  
**LEGAL SERVICES**  
(609) 695-6249

**MIDDLESEX COUNTY:**

Deputy Clerk of the Superior Court  
Administration Building  
Third Floor  
1 Kennedy Sq., PO Box 2633  
New Brunswick, NJ 08903-2633  
**LAWYER REFERRAL**  
(908) 828-0053  
**LEGAL SERVICES**  
(908) 249-7600

**MONMOUTH COUNTY:**

Deputy Clerk of the Superior Court  
71 Monument Park  
PO Box 1262  
Court House - East Wing  
Freehold, NJ 07728-1262  
**LAWYER REFERRAL**  
(908) 431-5544  
**LEGAL SERVICES**  
(908) 866-0020

**MORRIS COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division  
30 Schuyler Pl., PO Box 910  
Morristown, NJ 07960-0910  
**LAWYER REFERRAL**  
(201) 267-5882  
**LEGAL SERVICES**  
(201) 285-6911

**OCEAN COUNTY:**

Deputy Clerk of the Superior Court  
Court House, Room 119  
118 Washington Street  
Toms River, NJ 08754  
**LAWYER REFERRAL**  
(908) 240-3666  
**LEGAL SERVICES**  
(908) 341-2727

**PASSAIC COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division  
Court House  
77 Hamilton St.  
Paterson, NJ 07505  
**LAWYER REFERRAL**  
(201) 278-9223  
**LEGAL SERVICES**  
(201) 345-7171

**SALEM COUNTY**

Deputy Clerk of the Superior Court  
92 Market St., PO Box 18  
Salem, NJ 08079  
**LAWYER REFERRAL**  
(609) 678-8363  
**LEGAL SERVICES**  
(609) 451-0003

**SOMERSET COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division Office  
New Court House, 3rd Fl.  
PO Box 3000  
Somerville, NJ 08876  
**LAWYER REFERRAL**  
(908) 685-2323  
**LEGAL SERVICES**  
(908) 231-0840

**SUSSEX COUNTY**

Deputy Clerk of the Superior Court  
Sussex County Judicial Center  
43-47 High Street  
Newton, NJ 07860  
**LAWYER REFERRAL**  
(201) 267-5882  
**LEGAL SERVICES**  
(201) 383-7400

**UNION COUNTY**

Deputy Clerk of the Superior Court  
1st Fl., Court House  
2 Broad Street  
Elizabeth, NJ 07207-6073  
**LAWYER REFERRAL**  
(908) 353-4715  
**LEGAL SERVICES**  
(908) 354-4340

**WARREN COUNTY**

Deputy Clerk of the Superior Court  
Civil Division Office  
Court House  
Belvidere, NJ 07823-1500  
**LAWYER REFERRAL**  
(201) 267-5882  
**LEGAL SERVICES**  
(908) 475-2010

# EXHIBIT B

04/21/2005 11:30 FAX 260 673 1201

American Speciality

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File #4906-1  
 BDC/mr  
 PETRO COHEN PETRO MATARAZZO  
 A Professional Corporation  
 The Executive Plaza  
 2111 New Road  
 Suite 202  
 Northfield, NJ 08225  
 (609) 677-1700  
 Attorneys for Plaintiff, Jason Williams

RECEIVED and  
 FILED

MAR 28 2005

ATLANTIC COUNTY  
 LAW DIVISION

JASON WILLIAMS

Plaintiff,

v.

PHILADELPHIA PHILLIES

Defendants.

SUPERIOR COURT OF NEW JERSEY  
 LAW DIVISION  
 ATLANTIC COUNTY

DOCKET NO.

ATL-2187-05

Civil Action

COMPLAINT AND JURY DEMAND

Plaintiff, Jason Williams, residing at 269 West Louis Avenue, in the City of Egg Harbor,  
 County of Atlantic, State of New Jersey by way of Complaint against defendant hereby states:

### FIRST COUNT

1. On or about April 5, 2003, plaintiff Jason Williams was a ticket holder, patron and business invitee of defendant Philadelphia Phillies and was in Veteran Stadium, Philadelphia, Pennsylvania in order to attend a Philadelphia Phillies/Pittsburgh Pirates baseball game.

2. At the date and place aforesaid, plaintiff arrived during pre-game practice and was permitted by defendant's usher on to the edge of the field by the fence where a player from the Pittsburgh Pirates was autographing and tossing baseballs to approximately twenty (20) fans already gathered there.

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3. At the time and place aforesaid and while plaintiff was standing with this group of fans, he was struck in the face and injured by a line drive foul ball hit by a Pittsburgh Pirate player who was taking batting practice.

4. At the time and place aforesaid and prior thereto defendant through said defendant's agents, servants and/or employees negligently failed to provide plaintiff with a reasonably safe premises, negligently exposed plaintiff to an unreasonable risk of harm during pre-game activities, negligently permitted plaintiff, along with other fans onto the edge of the field thereby substantially increasing exposure and risk of harm, negligently permitted pre-game related activities that defendant knew or should have known were designed to attract fans including plaintiff onto or adjacent to the field, and to distract them from potential harm and said defendant was otherwise inattentive and careless all to plaintiff's detriment and loss.

5. As a result of defendant's negligence, plaintiff was caused to sustain severe painful and permit bodily injuries which injuries required plaintiff to undergo medical and surgical treatment, incapacitated plaintiff from pursuing his usual employment or other activities, caused plaintiff significant pain, suffering and mental anguish and which injuries shall, in the future, similarly incapacitate plaintiff, cause him pain and suffering and require medical treatment.

WHEREFORE plaintiff Jason Williams demands judgement on this Count against defendant the Philadelphia Phillies through said defendant's agents, servants and/or employees for damages, interests and costs of suit.

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**Interrogatory Demand in Lieu of Service**

Please take notice that Plaintiff demands answers to Form C and Form C(2) (The term "conditions" as employed in C(2) Interrogatories refers to the pre-game activities involving the Pittsburgh Pirate player autographing and tossing baseballs to a group of fans located adjacent to the field in the vicinity of Veteran Stadium Section 239) of the uniform set of interrogatories more specifically set forth in Appendix II of the 2003 Edition of the Rules Governing the Courts of the State of New Jersey in accordance with R. 4:17-1(b)(ii)(2).

**JURY DEMAND**

A demand for trial by jury is hereby made on all issues raised in these pleadings.

**CERTIFICATION PURSUANT TO RULE 4:5-1**

The undersigned, Barry Cohen, Esq., certifies on behalf of the above named as follows:

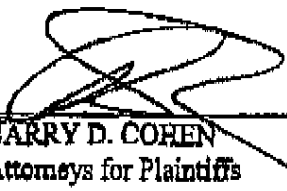
1. I am an attorney admitted to practice law in the State of New Jersey, with the firm of Petro Cohen Petro Matarazzo, PC, counsel for the above named.
2. The matter in controversy in this matter is not the subject of any other action pending in any Court or of a pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated.
3. At this time, there are no other parties who should be joined in this action.
4. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



PLEASE BE NOTIFIED that pursuant to Rule 4:25-4, Barry Cohen, Esquire, is hereby designated as trial counsel in the above-captioned litigation on behalf of the firm of Petro Cohen Petro Matarazzo, PC.

PETRO COHEN PETRO MATARAZZO

BY:


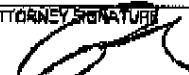
  
BARRY D. COHEN  
Attorneys for Plaintiffs

DATED: March 23, 2005

04/21/2005 11:31 FAX 260 673 3291

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CIVIL CASE INFORMATION STATEMENT (CIS)			FOR USE BY THE COURT		
 <p>Use for Initial Law Division – Civil Part pleadings (not motions) under Rule 4:3-1. Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or if attorney's signature is not affixed.</p>			PAYMENT TYPE: <input type="checkbox"/> OK <input type="checkbox"/> CG <input type="checkbox"/> CA		
			CHG/OK NO.		
			AMOUNT:		
			OVERPAYMENT:		
BATCH NUMBER:					
ATTORNEY/PRO SE NAME Barry D. Cohen, Esquire	TELEPHONE NUMBER 609 677-1700	COUNTY OF VENUE Atlantic			
FIRM NAME (if applicable) Petro Cohen Petro Matarazzo	<b>RECEIVED AND FILED</b>  <b>MAR 28 2005</b>  <b>ATLANTIC COUNTY LAW DIVISION</b>	DOCKET NUMBER (When available) BD-1-2187-05			
OFFICE ADDRESS Executive Plaza, Suite 202, 2111 New Road Northfield, New Jersey 08225		DOCUMENT TYPE Complaint			
		JURY DEMAND <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			
NAME OF PARTY (e.g., John Doe, Plaintiff) Jason Williams, Plaintiff	CAPTION Jason Williams v. The Philadelphia Phillies				
CASE TYPE NUMBER (See reverse side for listing) 605	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.				
RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IF YES, LIST DOCKET NUMBERS				
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY, IF KNOWN <input type="checkbox"/> NONE <input checked="" type="checkbox"/> UNKNOWN				
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.					
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION					
A. DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, IS THAT RELATIONSHIP <input type="checkbox"/> EMPLOYER-EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) _____ <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS			
B. DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO					
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION:					
plaintiff was struck and injured by a ball from the field during the visiting team's batting practice					
DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION:			
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, FOR WHAT LANGUAGE:			
ATTORNEY SIGNATURE 					

# EXHIBIT C

04/21/2005 11:28 FAX 280 673 1281

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# PETRO-COHEN-PETRO-MATARAZZO

ATTORNEYS AT LAW

FRANK A. PETRO  
(Certified Workers' Compensation Law Attorney)  
BARRY D. COHEN  
(Certified Civil Trial Attorney)  
SUSAN PETRO \*  
STEPHEN M. MATARAZZO \*

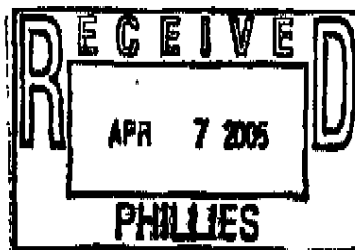
JEANINE WARRINGTON \*  
SUZANNE HOLZ MBOLA

TIMOTHY J. McILWAIN  
(Of Counsel)

MEMBER PA BAR \*

The Executive Plaza  
2111 New Road Suite 202  
Northfield, New Jersey 08225

telephone: 609-677-1700  
fax: 609-677-1700  
website: www.petrocohen.com  
email: petlaw@petrocohen.com



April 5, 2005

## CERTIFIED/RETURN RECEIPT REQUESTED

Philadelphia Phillies  
Citizen's Bank Park  
Philadelphia, PA 19148

Re: Williams v. Philadelphia Phillies, et al.  
D/A: 4/5/03  
Our File No. 4906-1

Dear Sir/Madam:

In accordance with the New Jersey Rules of Court, we are serving you with a Summons and Complaint with respect to litigation that has been instituted against you in the Superior Court of New Jersey, Law Division, Atlantic County. You have 35 days within which to file an Answer to the Complaint so that your financial interests may be protected.

If you were insured on April 5, 2003, the date of the incident, you should immediately give the enclosed Summons and Complaint to your insurance agent or insurance company so that they may protect you in defense of this litigation.

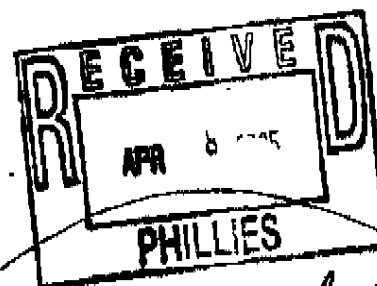
If you were uninsured at the time of this incident, please contact me upon receipt of this letter.

Thank you.

Very truly yours,

BARRY D. COHEN  
Direct Dial 609-677-1880, Ext. 12

BDC/mr  
Enclosure  
Certified 7001 1940 0005 5964 1793  
cc: First Class Mail



2222/800101 - Closed  
4-12. Please pull  
ASAP. Thank  
C.H.